

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

Case No. _____

(to be filled in by the Clerk's Office)

Ali L. Harrison-EL

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

BUCKS COUNTY CRIMINAL
JUSTICE CENTER, etc All

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

The Clerk will not file a civil complaint unless the person seeking relief pays the entire filing fee (currently \$350) and an administrative fee (currently \$52) in advance, or the person applies for and is granted in forma pauperis status pursuant to 28 U.S.C. § 1915. A prisoner who seeks to proceed in forma pauperis must submit to the Clerk (1) a completed affidavit of poverty and (2) a copy of the trust fund account statement for the prisoner for the six month period immediately preceding the filing of the complaint, obtained from and certified as correct by the appropriate official of each prison at which the prisoner is or was confined for the preceding six months. See 28 U.S.C. § 1915(a)(2).

If the Judge enters an order granting a prisoner's application to proceed in forma pauperis, then the order will assess the filing fee (currently \$350) against the prisoner and collect the fee by directing the agency having custody of the prisoner to deduct an initial partial filing fee equal to 20% of the greater of the average monthly deposits to the prison account or the average monthly balance in the prison account for the six-month period immediately preceding the filing of the complaint, as well as monthly installment payments equal to 20% of the preceding month's income credited to the account for each month that the balance of the account exceeds \$10.00, until the entire filing fee has been paid. See 28 U.S.C. § 1915(b). A prisoner who is granted leave to proceed in forma pauperis is obligated to pay the entire filing fee regardless of the outcome of the proceeding, and is not entitled to the return of any payments made toward the fee.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Ali A. Harrison-EL
 All other names by which
 you have been known:
 ID Number #042758
 Current Institution Bucks County Corr. Facility
 Address 1730 S. Easton Rd.
Doylestown PA 18901
City State Zip Code

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name * Weinstraub, Matthew D. etc. all
 Job or Title (*if known*) District Attorney
 Shield Number K/A
 Employer Bucks County Crim. Justice Ctr.
 Address 100 N. Main St.
Doylestown PA 18901
City State Zip Code
☒ Individual capacity ☒ Official capacity

Defendant No. 2

Name Jackson, Kevin J. etc. all
 Job or Title (*if known*) Bristol Twp. Police Dept. Officer
 Shield Number K/A
 Employer Bristol Twp. Police Dept.
 Address Barth Rd.
Bristol PA 19007
City State Zip Code
☒ Individual capacity ☒ Official capacity

Defendant No. 3

Name
Job or Title (if known)
Shield Number
Employer
Address

Jacher, Jennifer R. etc. all
Bristol Twp. Police Dept. Officer.
K/A
Bristol Twp. Police Dept.
Bath Rd.
Bristol PA 19007
City State Zip Code
☒ Individual capacity ☒ Official capacity

Defendant No. 4

Name
Job or Title (if known)
Shield Number
Employer
Address

* Judge Charissa J. Liller etc. all
Judge
K/A
Bucks County Crim. Justice Ctr.
100 N. Main St.
Doylestown PA 18901
City State Zip Code
☒ Individual capacity ☒ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- ☐ Federal officials (a *Bivens* claim)
☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

Right to a fair / impartial trial, Right to proper representation / self-representation
the "Right (Not) to have representation (Forced upon me), especially when civil suit has already been filed against said attorney CV-04726

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

Court of Common Pleas Bucks County
Docket Sheet shows that my assigned Judge was Judge McHugh courtroom 560
Judge Liller is courtroom 360

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed. On 1/17/24 I was illegally sentenced by judge Charissa J. Liller, who on record forced representation on me, as the attorney Craig Perqase whom I had already filed a civil suit against # CV-04726 filed 11/13/23 conflict of interest and a violation of 6th Amendment right. Attorney/District Attorney/Judge, conspired.
- III. Prisoner Status (Document Enclosed)

Indicate whether you are a prisoner or other confined person as follows (check all that apply):

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☒ Other (explain) Illegally detained and convicted detainee

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

In courtroom 360 Bucks County Courthouse (1/17/24) approx. 1:30 pm was forced to take representation of an attorney that I had already filed ineffective assistance of counsel against as well as had civilly sued CV-04726, by Judge Charissa Liller with DA and attorney Craig Perqase conspired due to time for

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose. Corrections

Doylestown Courthouse



E.D. Pa. Pro Se Notice, *approved February 11, 2019, revised May 8, 2023*

the appeals process, please see the website for the Third Circuit Court of Appeals for more information or contact the Third Circuit Court of Appeals.

Notices for Prisoner Litigants:

Pennsylvania Department of Corrections (DOC) Mail Policy: In accordance with the Pennsylvania DOC's policy number DC-ADM 803, Court mail must be sent to an inmate within DOC custody at the facility where the inmate is housed. Accordingly, inmates confined within the DOC should provide the Court with the address for the facility in which they are housed for purposes of the docket. Inmates should **NOT** provide the Court with the address for SMART COMMUNICATIONS, which is the contractor handling non-privileged inmate mail, because Court mail cannot be received at that address.

Filing Date: The filing date reflected on the Court's docket shows the date your filing was received by the Court. The *legal* filing date for your pleading may be different.

Three Strikes Rule: If you are a prisoner and your case is dismissed, it may affect your ability to file future civil actions while incarcerated without paying the full filing fee in advance. Under what is known as the "Three Strike Rule" of the Prison Litigation Reform Act, 28 U.S.C. § 1915(g), a prisoner who has had three or more civil actions or appeals dismissed as frivolous, malicious, or for failure to state a claim cannot file a new civil action without first paying the full filing fee, unless the prisoner is in imminent danger of serious bodily injury.

Notices for Habeas Cases:

If you filed a petition for a writ of *habeas corpus*, the filing fee is \$5.00. If you are granted leave to proceed *in forma pauperis* in a *habeas* case, you are not required to pay the filing fee. The application by a state prisoner to proceed *in forma pauperis* in a *habeas* case must include a certification by prison officials showing the amount in the prisoner's inmate account.

Local Rule of Civil Procedure 9.3 requires that all petitions for writs of *habeas corpus* filed by a person in state custody and all motions pursuant to 28 U.S.C. § 2255 (applicable to prisoners in custody under a federal court sentence) be filed on forms provided by the Court and shall contain the information called for by such forms. **Those forms contain important warnings about filing habeas petitions.** Briefly, petitions filed under 28 U.S.C. § 2254 and motions filed under 28 U.S.C. § 2255 must be filed within the one-year statute of limitations time limit set forth in 28 U.S.C. § 2244(d)(1) and are subject to limits on second or successive petitions or motions, which cannot be filed in a district court without permission from the United States Court of Appeals. This means you must include all the grounds for relief in your § 2254 petition or § 2255 motion or you may be barred from presenting additional grounds at a later date. Please note that under the rules that apply to *habeas*

E.D. Pa. Pro Se Notice, *approved February 11, 2019, revised May 8, 2023*

cases, discovery is generally not available.

**THIS NOTICE IS FOR INFORMATIONAL PURPOSES ONLY. PLEASE DO NOT FILE
ANY RESPONSES TO THIS NOTICE WITH THE COURT.**

C. What date and approximate time did the events giving rise to your claim(s) occur?

Jan. 17th 2024 approx. 1:30 P.M. - 2:30 P.M.
courtroom 360 in front of Judge Liller, Attorney
Craig Perqlase, DA Weiktraub, several Sheriffs, and
Alleged victim Breanna Leedom. (on record)

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

Constitutional Rights violated, forced legal representation I kept refusing, evidence entered illegally at sentencing by district attorney (unproven evidence, letters that didn't come from me, or facility I was at and names or them not mine) given a sentence greater than max.

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Cruel and Unusual punishment anxiety, stress, mentally depressed, already have brain aneurysm, and other serious medical issues.

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Wart case's overturned
Docket #s 0709/23 sentence's vacated, no probation
3063/23 or parole of any kind, and \$900,000 in damages,
lost wages, delay in serious medical surgeries needed
(back/neck/brain/4 hernias) Cruel and Unusual
Punishment, defamation of character, and for
malicious prosecution.

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

Bucks County Correctional Facility
1730 S. Easton Rd.
Doylestown, PA 18901

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☐ Yes

☐ No

☐ Do not know

N/A

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☐ Yes

☒ No

☐ Do not know

If yes, which claim(s)?

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☐ Yes

☒ No

N/A

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes

☒ No

N/A

- E. If you did file a grievance:

1. Where did you file the grievance?

N/A

2. What did you claim in your grievance?

N/A

3. What was the result, if any?

N/A

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. *(Describe all efforts to appeal to the highest level of the grievance process.)*

N/A

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

N/A

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any: Honorable Judge Rea Baylor
Honorable Judge Raymond McHugh (Continued)
Honorable Judge Finkley (Continued)
Honorable Judge Core (Continued)
Filed several Motions.

- G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies. Done everything imaginable no asking/
begging for your help.

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes

☒ No

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☒ No

Attorney Penglase but not same Facts

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) _____

Defendant(s) _____

2. Court (if federal court, name the district; if state court, name the county and State)
- _____

3. Docket or index number
- _____

4. Name of Judge assigned to your case
- _____

5. Approximate date of filing lawsuit
- _____

6. Is the case still pending?

☒ Yes

☐ No

If no, give the approximate date of disposition. _____

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

Pending

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

☐ Yes☒ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) _____

K/A

Defendant(s) _____

2. Court *(if federal court, name the district; if state court, name the county and State)*

K/A

3. Docket or index number

K/A

4. Name of Judge assigned to your case

K/A

5. Approximate date of filing lawsuit

K/A

6. Is the case still pending?

☐ Yes

☒ No

If no, give the approximate date of disposition _____

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

"A claim has factual plausibility when the plaintiff pleads factual context that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged."

Id., 129 S. Ct. 1937
"In determining the factual information to which the Court addresses its inquiry is limited to: (1) The facts set forth in the complaint, (2) documents attached to complaint (3) matters of which judicial notice be taken under Federal Rule of Evidence 201, Walker v. Beaumont Sch. Dist., 938 F.3d 724, 735, (5th Cir. 2011) (IF not received mails being tampered with)

The offense date was 12/31/22
on the Bucks County Docket
Sheet which means that;

"The allotted time-limit of
(2) years to fully prosecute
me had expired on 12/31/24.
therefore making all said
charges vacated and/or
dismissed due to lack of
prosecution"; so not only
was me being sentenced on
1/17/24 illegal, but it was
a violation of my 6th, 4th,
14th, 8th Amendment
Rights and a clear violation
of my Constitutional Rights
as well. And District Attorney
, Craig Pexglase, and all parties
mentioned participated in the
conspiracy thereof.

Attached Pages 3-4 all that
apply

